

TRINA A. HIGGINS, United States Attorney (#7349)  
BRYANT WATSON, Assistant United States Attorney  
Attorneys for the United States of America  
Office of the United States Attorney  
111 South Main Street, Suite 1800  
Salt Lake City, Utah 84111-2176  
Telephone: (801) 524-5682  
Email: [bryant.watson@usdoj.gov](mailto:bryant.watson@usdoj.gov)

FILED US District Court-UT  
JAN 15 '25 AM 11:13

**SEALED**

---

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH

---

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PUIFATU HUGH MOORS

and

LUCKY MATAELE,

Defendants.

Case Number 2:24-cr-00358 DAK

**SUPERSEDING INDICTMENT**

COUNT 1: Conspiracy to Transfer a  
Machinegun, 18 U.S.C. §§ 371, 922(o)

COUNT 2: Possession and Transfer of a  
Machinegun, 18 U.S.C. § 922(o)

COUNT 3: Possession and Transfer of a  
Machinegun, 18 U.S.C. § 922(o)

COUNT 4: Conspiracy to Transfer a  
Machinegun, 18 U.S.C. §§ 371, 922(o)

COUNT 5: Possession and Transfer of a  
Machinegun, 18 U.S.C. § 922(o)

COUNT 6: Possession and Transfer of a  
Machinegun, 18 U.S.C. § 922(o)

The Grand Jury charges:

COUNT 1

18 U.S.C. §§ 371, 922(o)  
(Conspiracy to Transfer a Machinegun)

On or about October 1, 2024, and continuing until October 9, 2024, in the District of Utah,

LUCKY MATAELE  
and  
PUIFATU HUGH MOORS,

the defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree together with each other to commit the following offense against the United States: to knowingly possess and transfer a machinegun, as defined by Title 26, United States Code 5845(b), that is, a machinegun conversion device commonly known as a “Glock Switch”; all in violation of 18 U.S.C. § 922(o), and did any act to effect the object of the conspiracy, to-wit: Met at a location to conduct the transfer; all in violation of 18 U.S.C. § 371 and § 922(o).

COUNT 2

18 U.S.C. § 922(o)  
(Possession and Transfer of a Machinegun)

On or about October 9, 2024, in the District of Utah,

LUCKY MATAELE,

the defendant herein, knowingly possessed and transferred a machinegun, as defined by Title 26, United States Code 5845(b), that is, a machinegun conversion device commonly known as a “Glock Switch”; all in violation of 18 U.S.C. § 922(o).

COUNT 3

18 U.S.C. § 922(o)  
(Possession and Transfer of a Machinegun)

On or about October 9, 2024, in the District of Utah,

PUIFATU HUGH MOORS,

the defendant herein, knowingly possessed and transferred a machinegun, as defined by Title 26, United States Code 5845(b), that is, a machinegun conversion device commonly known as a “Glock Switch”; all in violation of 18 U.S.C. § 922(o).

COUNT 4

18 U.S.C. §§ 371, 922(o)  
(Conspiracy to Transfer a Machinegun)

On or about October 1, 2024, and continuing until October 14, 2024, in the District of Utah,

LUCKY MATAELE  
and  
PUIFATU HUGH MOORS,

the defendants herein, did knowingly and intentionally combine, conspire, confederate, and agree together with each other to commit the following offense against the United States: to knowingly possess and transfer a machinegun, as defined by Title 26, United States Code 5845(b), that is, a firearm chambered in 7.62 x 39mm; all in violation of 18 U.S.C. § 922(o), and did any act to effect the object of the conspiracy, to-wit: exchanged approximately \$3,200 via Venmo in furtherance of the transfer, all in violation of 18 U.S.C. § 371 and § 922(o).

COUNT 5

18 U.S.C. § 922(o)  
(Possession and Transfer of a Machinegun)

On or about October 14, 2024, in the District of Utah,

LUCKY MATAELE,

the defendant herein, knowingly possessed and transferred a machinegun, as defined by Title 26, United States Code 5845(b), that is, a firearm chambered in 7.62 x 39mm; all in violation of 18 U.S.C. § 922(o).

COUNT 6


18 U.S.C. § 922(o)  
(Possession and Transfer of a Machinegun)

On or about October 16, 2024, in the District of Utah,

PUIFATU HUGH MOORS,

the defendant herein, knowingly possessed and transferred a machinegun, as defined by Title 26, United States Code 5845(b), that is, a firearm chambered in 7.62 x 39mm; all in violation of 18 U.S.C. § 922(o).

A TRUE BILL:

  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

TRINA A. HIGGINS  
United States Attorney

  
\_\_\_\_\_  
BRYANT WATSON  
Assistant United States Attorney